The Process of Phase II

At the close of Phase I, it was decided that in-depth quantitative research was needed to further investigate consumer understanding, preference, and satisfaction with current product labels. Additional information was needed on specific topics such as First Aid, ingredient information, precautionary statements, direction for use, storage and disposal instructions, consumer education, and standardized environmental information on product labels. Smaller subgroups of Partner and Task Force members were established to develop the quantitative research and to address these specific topics.

Throughout the course of Phase II, subgroups worked both separately and together. Information from quantitative and qualitative research was incorporated into decisions made by different subgroups. Similarly, knowledge provided by various subgroup members was taken into consideration when developing the quantitative and qualitative research; although, in one case, an omission led to inconclusive data. For example, the Storage and Disposal Subgroup shared information with the Consumer Education Subgroup in preparation for the Consumer Education Campaign. Another example of this interaction is that the quantitative mail survey questionnaire included questions about consumers' storage and disposal practices.

The History of Phase II

Phase II of the CLI began in **October 1996**. Between then and February 1997, Stakeholders involved in CLI engaged in planning and preparation activities. The group formally adopted and initiated a joint strategy for Phase II during the **March 1997** CLI "kick-off" Partner and Task Force meeting. At this meeting the proposal for the Phase II quantitative research was presented and Partner and Task Force members gave their support for the research plan and development. It was announced at this meeting that EPA would be unable to fund any quantitative research, given the magnitude of the project. Company and trade association partners felt very strongly that such research would be vital for producing sound recommendations for label improvement, and they voluntarily undertook to jointly fund and direct a quantitative research program that would involve all of the CLI project participants. Interim label improvements arising from the Phase I research were also announced at this meeting, as were policy initiatives such as standardizing label information. Finally, preliminary ideas for a consumer education campaign were discussed at this meeting.

In **April 1997**, the EPA met with environmental and public interest groups, and other interested parties, to bring them up to date on the CLI project and to introduce to them the quantitative research plan, interim label changes, policy initiatives, and consumer education project. Environmental and public interest groups were invited to actively participate in all aspects of the development of Phase II.

After initiation of Phase II, a media event was held in **September 1997**. The Assistant Administrator of EPA's Office of Prevention, Pesticides and Toxic Substances (OPPTS), Lynn Goldman, announced the immediate label changes that resulted from Phase I of CLI. These included: inclusion of a toll-free number on labels so that consumers could call someone in case of emergencies, use of common names for ingredients instead of chemical names, encouraging companies to use "other ingredients" instead of "inert ingredients," simple first aid instructions,

and changing the heading for these to read "First Aid." It was also announced that in Phase II a fuller investigation of the ingredients issues (i.e., right-to-know issues), and storage and disposal issues would take place. Finally, the initiation of the quantitative research and the development of the consumer education efforts were announced at this media event.

In **February 1998**, the entire CLI Partner and Task Force met in Alexandria, VA. At that meeting, the various subgroups gave status updates of the work they had done up to that point. Development of the quantitative consumer research was well under way and the research Core Group updated the rest of the Partner and Task Force members on the research methodology, questionnaire development, and research implementation. The EPA's Deputy Assistant Administrator for the Office of Prevention, Pesticides and Toxic Substances, Susan Wayland, asked Partner and Task Force members to begin investigating the feasibility of including standardized environmental information on product labels of household cleaners, indoor insecticides, and outdoor pesticides.

Implementation of the (national) quantitative survey began in **April 1998** with screening for participants and ended in **June 1998**. Results from the quantitative research were tabulated in several volumes of raw data. Relevant data were shared with the various subgroups (e.g., information about consumers' sources of information was shared with the Consumer Education Subgroup), to gain feedback and interpretation of the data from the subgroup. The data were analyzed by the research Core Group. This group met several times via conference calls and face-to-face meetings throughout the months of July and August to interpret and analyze the data in order to develop findings and implications.

During **June 1998**, while the quantitative research was coming to a close, a small subset of the Research Core Group was formed to address the Phase I charge of investigating standardized environmental information on product labels. It was decided that qualitative consumer research would be the best way to find out what types of environmental information consumers want to see on labels. At this point, results from the quantitative research were beginning to materialize, and they showed that, by and large, consumers did not consider environmental information to be one of the more important parts of product labels. Instead, they indicated that standardized label formats would be useful for increasing consumer comprehension of label information. The Core Group's focus, therefore, shifted: the qualitative research, used to enhance the findings from the quantitative research, would also be used to investigate consumer preference for standardized label formats.

Qualitative research took place during **July and August 1998**. Results from the research were incorporated into the overall conclusions from Phase II. The findings, implications, and conclusions of both the quantitative and qualitative research were presented to the entire CLI Partner and Task Force on the first day of the Partner and Task Force meeting in Washington, DC, in **September 1998**. Subgroups also presented the work they had done since the February meeting. During the second day of the meeting, CLI Partner and Task Force members made recommendations to the EPA for potential next steps (beyond Phase II) for CLI.

In **April 1999**, the EPA held another Partner and Task Force meeting in Alexandria, VA, to update CLI participants on steps that had been taken since, and in response to, the recommendations made at the September meeting. The CLI recommendations were considered by the EPA. The EPA's Office of Pesticide Programs (OPP) announced how it intended to

